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**Cc:** Farid Moghadassi <faridm@dfwlawgroup.com>

**Subject:** RE: Loan #39786 GRC Dallas Homes LLC - Statebridge; Estate Bank Balance = \$5,937.66

Rod,

The buyer/realtor is Marcus Sallis. His phone is 214-566-0093. His email is [mdsallis@greenwoodap.com](mailto:mdsallis@greenwoodap.com).

Marcus has bought troubled houses from me once before in another trustee case of mine. He has the ability to close.

**Chris**

*Christopher J. Moser* | Chapter 7 Trustee | Attorney  
Board Certified Business Bankruptcy Law and Consumer Bankruptcy Law

**Texas Board of Legal Specialization**

Quilling, Selander, Lownds, Winslett & Moser, P.C. | 2001 Bryan Street, Suite 1800, Dallas TX 75201

Direct: (214) 880-1805 | Fax: (214) 871-2111 | Email: [cmoser@qslwm.com](mailto:cmoser@qslwm.com)

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**From:** Rod Khavari <[rodk@dfwlawgroup.com](mailto:rodk@dfwlawgroup.com)>

**Sent:** Thursday, July 29, 2021 11:09 AM

**To:** Christopher Moser <[cmoser@qslwm.com](mailto:cmoser@qslwm.com)>

**Cc:** Farid Moghadassi <[faridm@dfwlawgroup.com](mailto:faridm@dfwlawgroup.com)>

**Subject:** RE: Loan #39786 GRC Dallas Homes LLC - Statebridge; Estate Bank Balance = \$5,937.66

**Importance:** High

Chris:

I have reviewed the correspondence below and I am disappointed to see that GRC's confidential information ( e.g. account status/balance) has been released to Robert Nicoud without authorization by GRC. Mr. Nicoud has channels through which he can properly obtain that information (e.g. discovery, subpoenas, etc.). Mr. Nicoud also knew that he is not necessarily entitled to that information, as suggested by his own email below inquiring about whether Padgett has authorization to release the information to Mr. Nicoud. As Plan Agent, your role is clearly defined by the Plan and assisting the Creditors in gathering information that can be used against the Debtor is not one of those authorities.

That said, unless authorized by the Plan or by order of the bankruptcy judge, you are not authorized to release any information to other parties without GRC's consent.

Finally, during the TRO hearing, you had indicated that you spoke to a realtor regarding pricing on the homes that remain in the Estate. Please share that information with GRC, as well.

Please let me know if you have any questions or would like to discuss this matter further.

Thank you,

**Rod B. Khavari**

*Attorney and Counselor at Law*

**Khavari & Moghadassi, Attorneys at Law, P.C.**

16818 Dallas Parkway

Dallas, Texas 75248

Tel: 972.225.4444

Fax: 972.225.4445

E-Mail: [rodk@dfwlawgroup.com](mailto:rodk@dfwlawgroup.com)

Visit our website: <http://www.dfwlawgroup.com>

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**From:** Kimberly Hill <[kimhill@qslwm.com](mailto:kimhill@qslwm.com)>

**Sent:** Thursday, July 29, 2021 10:50 AM

**To:** Christopher Moser <[cmoser@qslwm.com](mailto:cmoser@qslwm.com)>; kaz danesh ([cancunkaz@hotmail.com](mailto:cancunkaz@hotmail.com)) <[cancunkaz@hotmail.com](mailto:cancunkaz@hotmail.com)>; Rod Khavari <[rodk@dfwlawgroup.com](mailto:rodk@dfwlawgroup.com)>

**Subject:** RE: Loan #39786 GRC Dallas Homes LLC - Statebridge; Estate Bank Balance = \$5,937.66

**Importance:** High

The estate bank balance is \$5,937.66. See attached Form 2

Kimberly Hill

Paralegal to Chapter 7 Trustee, Christopher Moser

Quilling, Selander, Lownds, Winslett & Moser, P.C.

2001 Bryan Street Suite 1800

Dallas, TX 75201

214-871-2100 (main)

214-880-1817 (direct)  
214-871-2111 (fax)

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**From:** Christopher Moser <[cmoser@qslwm.com](mailto:cmoser@qslwm.com)>  
**Sent:** Thursday, July 29, 2021 10:48 AM  
**To:** kaz danesh ([cancunkaz@hotmail.com](mailto:cancunkaz@hotmail.com)) <[cancunkaz@hotmail.com](mailto:cancunkaz@hotmail.com)>; Rod Khavari <[rod@dfwlawgroup.com](mailto:rod@dfwlawgroup.com)>  
**Cc:** Kimberly Hill <[kimhill@qslwm.com](mailto:kimhill@qslwm.com)>  
**Subject:** FW: [EXTERNAL] - RE: Loan #39786 GRC Dallas Homes LLC - Statebridge

Do you want me to pay Statebridge?

**Chris**

**Christopher J. Moser** | Chapter 7 Trustee | Attorney  
Board Certified Business Bankruptcy Law and Consumer Bankruptcy Law  
Texas Board of Legal Specialization  
Quilling, Selander, Lownds, Winslett & Moser, P.C. | 2001 Bryan Street, Suite 1800, Dallas TX 75201  
Direct: (214) 880-1805 | Fax: (214) 871-2111 | Email: [cmoser@qslwm.com](mailto:cmoser@qslwm.com)

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**From:** Carlos Hernandez <[Carlos.Hernandez@padgettlawgroup.com](mailto:Carlos.Hernandez@padgettlawgroup.com)>  
**Sent:** Wednesday, July 28, 2021 4:12 PM  
**To:** Christopher Moser <[cmoser@qslwm.com](mailto:cmoser@qslwm.com)>; Robert Nicoud <[rmnicoud@dallas-law.com](mailto:rmnicoud@dallas-law.com)>  
**Cc:** Cheyenne Zokaie <[Cheyenne.Zokaie@padgettlawgroup.com](mailto:Cheyenne.Zokaie@padgettlawgroup.com)>; kaz danesh ([cancunkaz@hotmail.com](mailto:cancunkaz@hotmail.com)) <[cancunkaz@hotmail.com](mailto:cancunkaz@hotmail.com)>; Kimberly Hill <[kimhill@qslwm.com](mailto:kimhill@qslwm.com)>; Rod Khavari <[rod@dfwlawgroup.com](mailto:rod@dfwlawgroup.com)>  
**Subject:** RE: [EXTERNAL] - RE: Loan #39786 GRC Dallas Homes LLC - Statebridge

Herein the amounts owed:

June payment: \$1021.67  
July payment: \$1021.67  
*Potentially* August payment: \$1021.67  
Suspense (\$206.72)  
Escrow installment  
June: \$162.11  
July: \$162.11  
*Potentially* August \$162.11

Thank you Trustee Moser! Please let me know when they are issued and sent, so I can inform my client!  
Regards,  
Carlos Rafael



**Carlos R. Hernandez-Vivoni\***  
Bankruptcy Attorney - Texas  
5501 East LBJ Frwy, Ste. 925  
Dallas, TX 75240  
850.422.2520 x 7144 (Phone)  
850.422.2567 (Fax)  
866.480.9372 (Toll Free)  
[Carlos.Hernandez@Padgettlawgroup.com](mailto:Carlos.Hernandez@Padgettlawgroup.com)  
[www.padgettlawgroup.com](http://www.padgettlawgroup.com)  
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Escalation Contact: Cheyenne M. Zokaie, Supervising Attorney-Texas, [Cheyenne.Zokaie@padgettlawgroup.com](mailto:Cheyenne.Zokaie@padgettlawgroup.com)

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**From:** Christopher Moser <[cmoser@qslwm.com](mailto:cmoser@qslwm.com)>  
**Sent:** Wednesday, July 28, 2021 2:52 PM  
**To:** Carlos Hernandez <[Carlos.Hernandez@padgettlawgroup.com](mailto:Carlos.Hernandez@padgettlawgroup.com)>; Robert Nicoud <[rmnicoud@dallas-law.com](mailto:rmnicoud@dallas-law.com)>  
**Cc:** Cheyenne Zokaie <[Cheyenne.Zokaie@padgettlawgroup.com](mailto:Cheyenne.Zokaie@padgettlawgroup.com)>; kaz danesh ([cancunkaz@hotmail.com](mailto:cancunkaz@hotmail.com)) <[cancunkaz@hotmail.com](mailto:cancunkaz@hotmail.com)>; Kimberly Hill <[kimhill@qslwm.com](mailto:kimhill@qslwm.com)>; Rod Khavari <[rod@dfwlawgroup.com](mailto:rod@dfwlawgroup.com)>  
**Subject:** RE: [EXTERNAL] - RE: Loan #39786 GRC Dallas Homes LLC - Statebridge

What do you show as past due? I'll get it paid.

Chris

**Christopher J. Moser** | Chapter 7 Trustee | Attorney  
Board Certified Business Bankruptcy Law and Consumer Bankruptcy Law  
Texas Board of Legal Specialization  
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Direct: (214) 880-1805 | Fax: (214) 871-2111 | Email: [cmoser@qslwm.com](mailto:cmoser@qslwm.com)

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**From:** Carlos Hernandez <[Carlos.Hernandez@padgettlawgroup.com](mailto:Carlos.Hernandez@padgettlawgroup.com)>  
**Sent:** Wednesday, July 28, 2021 12:15 PM  
**To:** Christopher Moser <[cmoser@qslwm.com](mailto:cmoser@qslwm.com)>; Robert Nicoud <[rmnicoud@dallas-law.com](mailto:rmnicoud@dallas-law.com)>  
**Cc:** Cheyenne Zokaie <[Cheyenne.Zokaie@padgettlawgroup.com](mailto:Cheyenne.Zokaie@padgettlawgroup.com)>  
**Subject:** RE: [EXTERNAL] - RE: Loan #39786 GRC Dallas Homes LLC - Statebridge

Good afternoon Trustee Moser:  
My client wants to move with a Notice of Default under the plan, as the mortgage is currently due for 6/1/2021.  
Just wondering if those payments are in transit, or are to be paid soon, in order to avoid unnecessary efforts.  
Please let me know!  
Best Regards,  
Carlos Rafael



**Carlos R. Hernandez-Vivoni\***  
Bankruptcy Attorney - Texas  
5501 East LBJ Frwy, Ste. 925  
Dallas, TX 75240  
850.422.2520 x 7144 (Phone)  
850.422.2567 (Fax)  
866.480.9372 (Toll Free)  
[Carlos.Hernandez@Padgettlawgroup.com](mailto:Carlos.Hernandez@Padgettlawgroup.com)  
[www.padgettlawgroup.com](http://www.padgettlawgroup.com)  
\*Licensed in Texas & Puerto Rico

Escalation Contact: Cheyenne M. Zokaie, Supervising Attorney-Texas, [Cheyenne.Zokaie@padgettlawgroup.com](mailto:Cheyenne.Zokaie@padgettlawgroup.com)

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**From:** Christopher Moser <[cmoser@qslwm.com](mailto:cmoser@qslwm.com)>  
**Sent:** Thursday, May 20, 2021 9:52 AM  
**To:** Robert Nicoud <[rmnicoud@dallas-law.com](mailto:rmnicoud@dallas-law.com)>; Carlos Hernandez <[Carlos.Hernandez@padgettlawgroup.com](mailto:Carlos.Hernandez@padgettlawgroup.com)>  
**Subject:** RE: [EXTERNAL] - RE: Loan #39786 GRC Dallas Homes LLC - Statebridge

Carlos,

Please give Mr. Nicoud and me the unpaid balance of the loan.

Chris

**Christopher J. Moser** | Chapter 7 Trustee | Attorney  
Board Certified Business Bankruptcy Law and Consumer Bankruptcy Law  
Texas Board of Legal Specialization  
Quilling, Selander, Lownds, Winslett & Moser, P.C. | 2001 Bryan Street, Suite 1800, Dallas TX 75201  
Direct: (214) 880-1805 | Fax: (214) 871-2111 | Email: [cmoser@qslwm.com](mailto:cmoser@qslwm.com)

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**From:** Robert Nicoud <[rmnicoud@dallas-law.com](mailto:rmnicoud@dallas-law.com)>  
**Sent:** Thursday, May 20, 2021 9:44 AM  
**To:** Carlos Hernandez <[Carlos.Hernandez@padgettlawgroup.com](mailto:Carlos.Hernandez@padgettlawgroup.com)>  
**Cc:** Christopher Moser <[cmoser@qslwm.com](mailto:cmoser@qslwm.com)>  
**Subject:** [EXTERNAL] - RE: Loan #39786 GRC Dallas Homes LLC - Statebridge

Carlos:

Do you have permission to tell me the current balance. I am including Chris Moser in this email as he is the post-confirmation plan agent who is handling payments for GRC.

Thanks for your assistance.

*Robert M. Nicoud, Jr.*  
(214) 540-7542

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**From:** Carlos Hernandez <[Carlos.Hernandez@padgettlawgroup.com](mailto:Carlos.Hernandez@padgettlawgroup.com)>  
**Sent:** Wednesday, May 12, 2021 11:10 AM  
**To:** Robert Nicoud <[rmnicoud@dallas-law.com](mailto:rmnicoud@dallas-law.com)>  
**Subject:** Loan #39786 GRC Dallas Homes LLC - Statebridge

Hello brother counsel Nicoud:  
Herewith my contact information to open the channels of communication on this matter .  
Regards,  
Carlos Rafael  
P.S.  
I'm sharing here with you the Deed of Trust, as this one is public information.



**Carlos R. Hernandez-Vivoni\***  
**Bankruptcy Attorney - Texas**  
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[www.padgettlawgroup.com](http://www.padgettlawgroup.com)  
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Escalation Contact: Cheyenne M. Zokaie, Supervising Attorney-Texas, [Cheyenne.Zokaie@padgettlawgroup.com](mailto:Cheyenne.Zokaie@padgettlawgroup.com)

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